

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

IN RE:
JERRI LYNN WILSON
DEBTOR

CASE NO. 16-31883
CHAPTER 13

SUPPLEMENTAL RESPONSE TO
TRUSTEE'S OBJECTION TO BSI FINANCIAL SERVICES PROOF OF CLAIM
FILED DECEMBER 20, 2016 AS COURT CLAIM 5

COMES NOW Wilmington Savings Fund Society, FSB, DBA Christiana Trust, Not Individually but as Trust for Ventures Trust 2013-I-H-R ("Wilmington"), by and through its undersigned attorney, and supplements the Response to Trustee's Objection to BSI Financial Services Proof of Claim Filed December 20, 2016 As Court Claim 5, filed on February 17, 2017 as docket entry 34, as follows:

1. Proof of claim 5-1 (the "Claim") was filed on December 20, 2016 by creditor Wilmington Savings Fund Society, FSB, DBA Christiana Trust, Not Individually but as Trust for Ventures Trust 2013-I-H-R.
2. On May 26, 2017, a Transfer of Claim was filed transferring the Claim to Wilmington Savings Fund Society, fsb, D/B/A Christiana Trust, Not Individually But As Trustee For Ventures Trust 2013-I-H-R, A Delaware Trust C/O Fay Servicing, LLC.
3. Fay Servicing, LLC is the new servicer on the loan underlying the Claim.
4. Fay Servicing, LLC intends to file an amended proof of claim within 10 days that will bring the loan current for all amounts due as of the date of the dismissal of the borrower's prior bankruptcy case on May 11, 2016.

WHEREFORE, Wilmington Savings Fund Society, FSB, DBA Christiana Trust, Not Individually but as Trust for Ventures Trust 2013-I-H-R respectfully requests that this Court enter an order overruling the Trustee's Objection to BSI Financial Services Proof of Claim Filed December 20, 2016 as Court Claim 5 and for such other and further relief as the court deems just.

Dated: June 21, 2017

Respectfully Submitted,

/s/ Bethany Wojtanowicz
Bethany Wojtanowicz
Weinstein & Riley, P.S.
Attorney for Fay Servicing LLC
2001 Western Ave, Suite 400
Seattle, WA 98121
Phone: (206) 269-3430
Email: BethanyW@w-legal.com

CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2017, a true and correct copy of the foregoing document was electronically filed using the Court's ECF system which will send notification of such filing to the following:

Debtor's Attorney

Patrick M. Seese
seeselawoffice@sbcglobal.net

Trustee

Debra L. Miller
dmecf@trustee13.com

U.S. Trustee

Nancy J. Gargula
USTPRegion10.SO.ECF@usdoj.gov

I hereby certify that on June 21, 2017, a true and correct copy of the foregoing document was sent via first-class mail to the following:

Debtor

Jerri Lynn Wilson
51900 Renshaw Drive
South Bend, IN 46628

/s/ Nikole Montufar

Nikole Montufar
Legal Assistant to Bethany Wojtanowicz